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March 15, 2011

Via Electronic Filing

The Honorable Michael A. Shipp
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

*RE: Sperry Associates Federal Credit Union vs. CUMIS Ins. Society, Inc.,
Case No. 10-CV-00029-DRD-MAS*

Your Honor:

As requested by the Court at the Case Management Conference on March 1, 2011, defendant CUMIS Insurance Society, Inc. ("CUMIS") writes to provide a status report concerning plaintiff Sperry Federal Credit Union's ("Sperry") production of documents. During the Case Management Conference, counsel for CUMIS advised the Court and Sperry's counsel that certain categories of documents appeared to be missing from Sperry's production. Sperry's counsel agreed to investigate, and determine whether there are additional documents available for production.

On March 2, 2011, counsel for CUMIS sent a letter to counsel for Sperry outlining the categories of documents CUMIS believes are missing from Sperry's production. (See, Exhibit A). On March 15, 2011, Sperry responded by advising that it would be too burdensome to produce certain files for loans that were serviced by CU National, but not sold, and therefore, Sperry would object to producing the additional loan files. In addition, Sperry requested clarification and additional information concerning one category of documents. Sperry did not produce any documents. Accordingly, CUMIS intends to meet and confer with Sperry's counsel concerning Sperry's production, and may need to bring a motion to compel.

Thank you for your consideration of the above.

Respectfully Submitted,

/s/ Arthur H. Aizley

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